

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TARA LEIGH PATRICK, et al.,	)	
Plaintiffs,	)	
	)	
v.	)	Civil No. 19-11445-LTS
	)	
	)	
D. & B. CORP., et.al.,	)	
Defendants.	)	

**PARTIES' JOINT STATUS REPORT AND PROPOSED  
DISCOVERY AND MOTION PRACTICE SCHEDULE**

Per the Court's June 30, 2020 order, (Doc. No.37), the parties hereby submit their Joint Status Report and proposed Discovery and Motion Practice Schedule.

**I. APPEARANCE OF COUNSEL FOR THE DEFENDANTS.**

John G. Walsh shall enter an appearance on behalf of each of the defendants in this case along with the filing of this pleading.

**II. PLAINTIFFS' PENDING REQUEST FOR SANCTIONS AND MOTION TO AMEND  
THEIR COMPLAINT TO ADD NEW PLAINTIFFS AS PARTIES.**

Pending before the Court are the plaintiffs' *Letter/Request for Sanctions* (Doc. No. 26) and their *Motion for Leave to Amend Their Complaint*. (Doc. No. 29). After conferring on these matters, the plaintiffs hereby withdraw that letter/request and the defendants assent to that motion, and assuming the Court grants that motion, the plaintiffs shall serve their amended complaint on the defendants upon the Court's allowance of that motion.

### **III. PROPOSED DISCOVERY AND MOTION PRACTICE SCHEDULE.**

The parties submit the following proposed discovery and motion practice schedule which they suggest is necessary to ensure a fair, just and reasonable resolution of this matter given the history of this case and the fact that the plaintiffs seek to amend their complaint to add eleven new plaintiffs as parties in addition to the current nine plaintiffs in this action.

**A. Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and the Court must be completed by July 28, 2020.

**B. Fact Discovery-Interim Deadlines.**

1) All requests for production of documents and interrogatories must be served by December 31, 2020.

2) All requests for admissions must be served by February 26, 2021.

3) All depositions, other than expert depositions, must be completed by May 31, 2021.

4) Final Discovery Deadline. All discovery, other than expert discovery, must be completed by May 31, 2021.

**C. Status Conference.** A Status Conference will be held on a date to be determined by the Court.

**D. Expert Discovery.**

1) Trial experts for the party with the burden of proof must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by June 30, 2021.

2) Rebuttal experts must be designated, and the information contemplated

by Fed. R. Civ. P. 26(a)(2) must be disclosed by July 31, 2021.

3) All trial experts must be deposed by September 30, 2021.

**E. Dispositive Motions.** Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by October 13, 2021, with the opposition due thirty days thereafter.

**F. Initial Pretrial Conference.** An initial pretrial conference will be held on a date to be determined by the Court.

Respectfully submitted,  
The plaintiffs,  
By their attorneys

/s/ John V. Golaszewski  
John V. Golaszewski  
1740 Broadway- 15<sup>th</sup> Flr.  
New York, NY 10019  
(646) 872-3178  
john@talentrights.law  
*Admitted Pro Hac Vice*

Respectfully submitted,  
The defendants,  
by their attorney,

/s/ John G. Walsh  
John G. Walsh, BBO No. 555649  
63 Atlantic Avenue-3<sup>rd</sup> Flr.  
Boston, MA 02110  
(617) 851-2429  
johnwalsh15@rcn.com